

Daniel J. King, Esq.#115862
LAW OFFICES OF DANIEL J. KING
6320 Canoga Avenue, Suite 675
Woodland Hills, CA 91367
Tel.: (818) 587-9299
Fax: (866) 260-2160

Attorneys for Plaintiff,
CAROL J. CONNORS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

IN RE: ZIMMER NEXGEN KNEE
IMPLANT PRODUCTS LIABILITY
LITIGATION

) **MDL No. 2272**

) **Master Docket No: 1:11cv05468**

This Document Relates to:

CAROL J. CONNORS
Case No. 2:12-cv-02112
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) **PLAINTIFF, CAROL J. CONNORS'**
) **INITIAL DISCLOSURE'S PURSUANT**
) **TO FRCP RULE 26(A)(1)**

INITIAL DISCLOSURES OF PLAINTIFF,
CAROL J. CONNORS PURSUANT TO RULE 26(a)(1)

The following Disclosures are made solely for the purposes of this action. Plaintiff has not yet completed investigation of the facts relating to this action, and has not yet completed discovery in this action, and has not yet completed preparation for trial. Consequently, the following Disclosures are given without prejudice to the right to identify and/or produce, subsequent hereto and/or at the time of trial, any and all subsequently discovered evidence pertaining to the proof of presently known material facts, and to produce all evidence, when discovered, relating to the proof of subsequently discovered material facts.

1 This Preliminary Statement is, by this reference, incorporated into each and every one
2 of the following Disclosures.

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4 **I. Individuals And/or Entities Likely to Have Discoverable Information**
5 **That May Be Used to Support Connors' Claims:**
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7 Plaintiff's initial disclosure is made without the benefit of any discovery. Plaintiff
8 reserves the right to amend its disclosures to add additional witnesses.
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|----|----|--------------------------------|---------------------|
| 10 | 1. | Carol J. Connors | Plaintiff |
| 11 | | 1515 Amherst Ave. #103 | |
| 12 | | Los Angeles, CA 90025 | |
| 13 | 2. | Walter R. O'Brien, M.D. | Surgeon |
| 14 | | 11600 Wilshire Boulevard, #522 | |
| 15 | | Los Angeles, CA 90025 | |
| 16 | | 310 477-7276 | |
| 17 | 3. | Peter G. Alexakis, M.D. | Assisting Surgeon |
| 18 | | 1250 16th Street, Suite 2100 | |
| 19 | | Santa Monica, CA 90404 | |
| 20 | | (310) 319-1234 | |
| 21 | 4. | Damon B. Raskin, M.D. | Attending Physician |
| 22 | | 881 Alma Real Dr Ste 103 | |
| 23 | | Pacific Palisades, CA 90272 | |
| 24 | | (310) 459-4333 | |
| 25 | 5. | William Prudich | Co-worker |
| 26 | | L.A. Danceforce, Inc. | |
| 27 | | 1020 N. Cole Avenue, #4370 | |
| 28 | | Hollywood, CA 90038 | |
| | | 213 656-9619 | |
| | 6. | Randall Allaire | Co-worker |
| | | L.A. Danceforce, Inc. | |
| | | 1020 N. Cole Avenue, #4370 | |
| | | Hollywood, CA 90038 | |
| | | 213 656-9619 | |

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|-----|--|--------------------|
| 7. | Tim Logan
L.A. Danceforce, Inc.
1020 N. Cole Avenue, #4370
Hollywood, CA 90038
213 656-9619 | Co-worker |
| 8. | Eileen Marek
L.A. Danceforce, Inc.
1020 N. Cole Avenue, #4370
Hollywood, CA 90038
213 656-9619 | Co-worker |
| 9. | Sheila Stewart
5334 Ben Avenue
Valley Village, CA 91607 | Friend |
| 10. | Donna Bennett
2270 29 th Street
Santa Monica, CA 90405 | Friend |
| 11. | Pro Physical Therapy
488 S. San Vicente Blvd.
Los Angeles, CA
323 655-9055 | Physical Therapist |
| 12. | Joel Pope
Gold's Gym
1016 Cole Avenue
Hollywood, CA 90038
323-462-7012 | Personal Trainer |

II. Documentary Evidence:

A. Records regarding the Plaintiff's Medical Treatment:

Walter R. O'Brien, M.D.
11600 Wilshire Boulevard, #522
Los Angeles, CA 90025
310 477-7276

St. John's Health Center
1328 Twenty Second Street
Santa Monica, CA 90404
(310) 829-5511

1 Damon B. Raskin, M.D.
2 881 Alma Real Drive
3 Suite 103
4 Pacific Palisades, CA 90272
5 (310) 459-4333

6 Pro Physical Therapy
7 488 S. San Vicente Blvd.
8 Los Angeles, CA
9 323 655-9055

10 **B. Records regarding Plaintiff's Earnings:**

11 L.A. Danceforce, Inc.
12 1020 N. Cole Avenue, #4370
13 Hollywood, CA 90038

14 **III. Computation of Damages**

15 Carol J. Connors has suffered and will incur damages, as follows:

16 1. All past and future medical expenses relating to the implantation surgery and
17 the complications thereafter, including follow-up treatment, physical therapy,
18 examinations and consultations relating to the pain resulting therefrom.

19 2. Past and future lost wages related to time lost from work and/or inability to
20 take on work. Lost earning capacity due to permanent injuries sustained as a result of
21 the failure of the implant device and related components.

22 3. General damages to compensate Plaintiff for pain and suffering both in the
23 past and that to be suffered in the future in an amount according to proof.
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1 DATED: May 30, 2012

LAW OFFICES OF DANIEL J. KING

2
3 /s/ Daniel J. King

4 By

5 DANIEL J. KING, Attorneys for Plaintiff,
6 CAROL J. CONNORS

7 Daniel J. King, Esq.
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CERTIFICATE OF SERVICE

I certify that on May 30, 2012, a copy of the foregoing Plaintiff's Initial Disclosure Pursuant to Rule 26(a)(1) was served upon:

Nicole Brett
BAKER & DANIELS LLP
Suite 800
111 E. Wayne Street
Fort Wayne, IN 46802

DATED: May 30, 2012

LAW OFFICES OF DANIEL J. KING

By /s/ Daniel J. King
DANIEL J. KING, Attorneys for Plaintiff,
CAROL J. CONNORS

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